

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

FILED  
U.S. DISTRICT COURT  
INDIANAPOLIS DIVISION

1999 JUL 27 PM 4:11

SOUTHERN DISTRICT  
OF INDIANA  
LAURA A. BRIGGS  
CLERK

STATE OF INDIANA,

Plaintiff,

v.

CAUSE NO. IP99-0853-Y/S

SENIOR CITIZENS REMODELING, INC.,

SENIOR CITIZENS REMODELING OF  
INDIANA, INC.,

HARVEY JACK WALLER,

ROBERT OLSON, SR.,

ROBERT OLSON, JR.,

SENIOR INCOME REVERSE MORTGAGE  
CORPORATION,

STEVE BAER,

JEFF HOSTETTER,

COMMUNITY ACTION INCORPORATED,

CINDY ZEIGLER BOBOLTZ, and

Defendants.

**MOTION FOR DEFAULT JUDGMENT**

Plaintiff, State of Indiana, by counsel, Attorney General Jeffrey A. Modisett by his deputies, Roy P. Coffey, Mary Ann Wehmueller, and Theresa A. Stevens, move for entry of default judgment against Defendant, Senior Citizens Remodeling of Indiana, Inc., pursuant to Fed. R. Civ. Proc. 55 based upon the following:

1. On June 9, 1999, Plaintiff filed a complaint against Defendant, Senior Citizens Remodeling of Indiana, Inc., in this Court. The complaint and summons were served via certified mail on June 10, 1999.

2. Defendant, Senior Citizens Remodeling of Indiana, Inc., therefore was required to respond to the complaint by June 30, 1999.

3. To date, Defendant, Senior Citizens Remodeling of Indiana, Inc., has failed to answer or otherwise respond to Plaintiff's complaint.

WHEREFORE, Plaintiff, State of Indiana, prays for entry of default judgment against Defendant, Senior Citizens Remodeling of Indiana, Inc., in an amount commensurate with its damages, plus interest accruing, punitive damages to be determined at a trial on damages, all costs of this action, injunctive relief, and for all other relief which this Court may deem appropriate.

Respectfully submitted,

JEFFREY A. MODISSETT  
Attorney General of Indiana  
Atty. No. 0014704-49

By: 

Roy P. Coffey  
Deputy Attorney General  
Atty. No.

By: 

Mary Ann WehmueLLer  
Deputy Attorney General  
Atty. No. 15251-49A

By: 

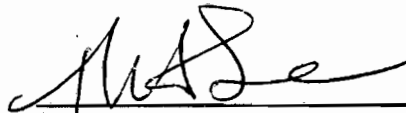
Theresa A. Stevens

Deputy Attorney General  
Atty. No. 17569-49

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion for Default Judgment has been duly served upon the following by United States Mail, first class, postage prepaid, this 27th day of July, 1999.

Senior Citizens Remodeling of Indiana, Inc.  
c/o CT Corporation, Resident Agent  
One North Capitol Avenue  
Indianapolis, IN 46204-3000



Theresa A. Stevens

Office of Attorney General  
I.G.C.S. - Fifth Floor  
402 West Washington Street  
Indianapolis, IN 46204-2770  
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